

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC.
and
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil Action No.: 1:21-cv-11558-LTS

JOINT MOTION FOR ENTRY OF AN ORDER GOVERNING FACT DEPOSITIONS

Plaintiffs, the United States of America and the States of Arizona, California, Florida, Massachusetts, Pennsylvania, Virginia, and the District of Columbia (collectively, “Plaintiffs”), and Defendants, American Airlines Group Inc. and JetBlue Airways Corporation (collectively, “Defendants,” and together with Plaintiffs, the “Parties”) respectfully submit to the Court this Joint Motion for Entry of an Order Governing Fact Depositions (“Deposition Protocol”).

Pursuant to paragraph 12 of the Scheduling and Case Management Order, ECF No. 76, and in accordance with Rule 26(f) of the Federal Rules of Civil Procedure and Rule 16.1 of the Local Civil Rules, Plaintiffs and Defendants met and conferred on December 23, 2021, January 27, 2022, and March 16, 2022 regarding a Deposition Protocol. Plaintiffs and Defendants respectfully request that the Court enter the proposed attached Deposition Protocol reflecting the Parties’ agreement.

Dated: March 30, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on March 30, 2022, I filed the foregoing document with the United States District Court for the District of Massachusetts using the CM/ECF system, and caused it to be served on all registered participants via the notice of electronic filing (the “NEF”).

/s/ James H. Congdon

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